

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Tel: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com

Scott Davidson
Direct Dial: 212-556-2164
sdavidson@kslaw.com

October 5, 2015

VIA E-MAIL TRANSMISSION AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically,

1. On October 1, 2015, pursuant to Judge Furman’s Order No. 81 ¶ 2 (MDL Docket No. 1404),¹ counsel for New GM filed a letter (“October 1 Letter”) in MDL 2543 to apprise the District Court of New GM’s position with respect to motions filed in MDL 2543 by the *Brown, Dowling, Fobbs, Gregory, Hoskins, Keeler, Lelonek, Modeste, Rowe, and Smith* plaintiffs for leave to amend their complaints (collectively, the “Motions to Amend”). Copies of the October 1 Letter and the 10 Motions to Amend are annexed hereto as Exhibits “1” through “11” respectively.

¹ A copy of MDL Order No. 81 was previously provided to the Court by update letter dated September 25, 2015.

Honorable Robert E. Gerber
October 5, 2015
Page 2

2. On October 1, 2015, the Groman Plaintiffs filed with the Second Circuit Court of Appeals an *Unopposed Motion For Redesignation As Appellants And Memorandum In Support* (“**Redesignation Motion**”). A copy of the Redesignation Motion is attached hereto as Exhibit “12.”
3. On October 2, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Agenda Letter**”) addressed to Judge Furman setting forth the parties’ tentative agenda for the October 9, 2015 status conference before Judge Furman. A copy of the Joint Agenda Letter is attached hereto as Exhibit “13.”

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd
Encl.

cc: Edward S. Weisfelner
Howard Steel
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Alexander H. Schmidt
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
Jamison Diehl
William Weintraub
Steve W. Berman
Elizabeth J. Cabraser
Robert C. Hilliard
Gary Peller